



Kewaunee Nuclear Power Plant  
N490 Highway 42  
Kewaunee, WI 54216-9511  
920.388.2560

Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, WI 54241  
920.755.2321

Kewaunee / Point Beach Nuclear  
Operated by Nuclear Management Company, LLC

NRC-02-053

10 CFR 50.90

July 19, 2002

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Proposed Amendment 180a Application For Technical Specification Change Regarding Missed Surveillance (and Adoption of a Technical Specifications Bases Control Program) Using The Consolidated Line Item Improvement Process

Reference 1. Letter from Mark E. Warner (NMC) to Document Control Desk (NRC), dated May 7, 2002, "Proposed Amendment 180 Application For Technical Specification Change Regarding Missed Surveillance (and Adoption of a Technical Specifications Bases Control Program) Using The Consolidated Line Item Improvement Process."

In accordance with the provisions of 10 CFR 50.90, Nuclear Management Company, LLC (NMC) is submitted in reference 1 a request for an amendment to the Technical Specifications (TS) for the Kewaunee Nuclear Power Plant.

The proposed amendment would modify TS requirements for meeting surveillances in TS 4.0.a, TS requirements for missed surveillances in TS 4.0.c, and TS requirements for a Bases control program consistent with TS Bases Control Program described in Section 5.5 of NUREG-1431, Standard Technical Specifications for Westinghouse Plants, Revision 2.

During a discussion with the NRC staff concerning this license amendment request, several changes were recommended. They were:

1. Technical Specification 6.21.b, changes the word "involve" to "require".
2. Technical Specification basis page TS B4.0-1, in the first line change "must be performed" to "must be met".
3. Technical Specification basis page TS B4.0-1, in the fourth line change "verify the operational status" to "verify the operability".

Accol

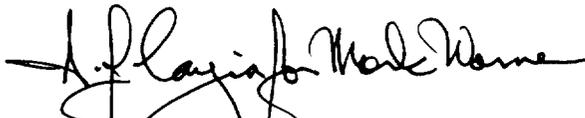
Docket 50-305  
NRC-02-053  
July 19, 2002  
Page 2

These changes have been made and are thereby submitted. The description of the proposed changes, the requested confirmation of applicability, the plant-specific verifications and the TS pages, and regulatory commitments contain in reference 1 are still applicable, except for those changes contained in the attachments to this letter. Attachment 1 provides the changed TS pages marked up to show the proposed changes. Attachment 2 provides revised (clean) TS pages.

NMC still requests approval of the proposed License Amendment by August 2002, with the amendment being implemented within 45 days. The approval date was administratively selected to allow for NRC review but the plant does not require this amendment to allow continued safe full power operation.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based entirely on my personal knowledge, but on information furnished by cognizant NMC employees and consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 19, 2002.



Mark E. Warner  
Site Vice President

GOR

Attachments:     1    -   Modified Proposed Technical Specification Changes  
                  2    -   Modified Revised Technical Specification Pages

cc:    US NRC Region III  
      US NRC Senior Resident Inspector  
      Electric Division, PSCW

ATTACHMENT 1

To

Letter from M. E. Warner (NMC)

To

Document Control Desk (NRC)

Dated

July 19, 2002

Proposed Amendment 180a

Strikeout TS Pages:

TS B4.0-1

TS 6.21-1

## BASIS - Surveillance Requirements (TS 4.0)

TS 4.0.a establishes the requirements that surveillances must be ~~performed~~met during the operational MODES or other conditions for which the requirements of ~~the~~ LIMITING CONDITIONS FOR OPERATION (LCO) apply unless otherwise stated in an individual surveillance requirement. The purpose of this TS is to ensure that surveillances are performed to verify the ~~operational status~~OPERABILITY of systems and components and that parameters are within specified limits. This ensures safe operation of the facility when the plant is in a MODE or other specified condition for which the associated LCOs are applicable. Surveillance requirements do not have to be performed when the facility is in an operational MODE for which the requirements of the associated LCO do not apply unless otherwise specified. Surveillance requirements do not have to be performed on inoperable equipment because the action requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

TS 4.0.b establishes the limit for which the specified time interval for surveillance requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operation conditions that may not be suitable for conducting the surveillance (e.g., transient conditions or other ongoing surveillance or maintenance activities). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of TS 4.0.b is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

TS 4.0.c establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the allowed surveillance interval. A delay period of up to 24 hours or up to the limit of the allowed surveillance interval, whichever is greater, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with TS 4.0.b, and not at the time that the allowed surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

**6.21 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM**

The Bases Control Program shall be established, implemented and maintained. This program provides a means for processing changes to the bases of these Technical Specifications.

- a. Changes to the bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to bases without prior NRC approval provided the changes do not require either of the following:
  - 1. A change in the TS incorporated in the license
  - 2. A change to the updated USAR or bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the bases are maintained consistent with the USAR.
- d. Proposed changes that meet the criteria of Specification 6.5.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

ATTACHMENT 2

To

Letter from M. E. Warner (NMC)

To

Document Control Desk (NRC)

Dated

July 19, 2002

Proposed Amendment 180a

Affected TS Pages:

TS B4.0-1

TS 6.21-1

## **BASIS - Surveillance Requirements (TS 4.0)**

TS 4.0.a establishes the requirements that surveillances must be met during the operational MODES or other conditions for which the requirements of the LIMITING CONDITIONS FOR OPERATION (LCO) apply unless otherwise stated in an individual surveillance requirement. The purpose of this TS is to ensure that surveillances are performed to verify the OPERABILITY of systems and components and that parameters are within specified limits. This ensures safe operation of the facility when the plant is in a MODE or other specified condition for which the associated LCOs are applicable. Surveillance requirements do not have to be performed when the facility is in an operational MODE for which the requirements of the associated LCO do not apply unless otherwise specified. Surveillance requirements do not have to be performed on inoperable equipment because the action requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

TS 4.0.b establishes the limit for which the specified time interval for surveillance requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operation conditions that may not be suitable for conducting the surveillance (e.g., transient conditions or other ongoing surveillance or maintenance activities). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of TS 4.0.b is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

TS 4.0.c establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the allowed surveillance interval. A delay period of up to 24 hours or up to the limit of the allowed surveillance interval, whichever is greater, applies from the point in time that it is discovered that the surveillance has not been performed in accordance with TS 4.0.b, and not at the time that the allowed surveillance interval was not met.

This delay period provides adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

## 6.21 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

The Bases Control Program shall be established, implemented and maintained. This program provides a means for processing changes to the bases of these Technical Specifications.

- a. Changes to the bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to bases without prior NRC approval provided the changes do not require either of the following:
  1. A change in the TS incorporated in the license
  2. A change to the updated USAR or bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the bases are maintained consistent with the USAR.
- d. Proposed changes that meet the criteria of Specification 6.5.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).